IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN13 DISTRICT OF
PENNSYLVANIA

In RE:	)	
	)	
CHRISTOPHER S. GRAHAM and SARA	)	BANKRUPTCY CASE NO. 15-70664
N. GRAHAM, his wife	)	
Debtors	)	MOTION NO.
	)	CHAPTER 13
PEOPLES NATURAL GAS COMPANY,	)	
LLC	)	
Movant,	)	
vs.	)	
CHRISTOPHER S. GRAHAM and SARA	)	
N. GRAHAM, his wife, and RONDA J.	)	
WINNECOUR, ESQUIRE, Trustee	)	
Respondents.		

**NOTICE THAT THE PEOPLES NATURAL GAS COMPANY, LLC SEEKS TO
INCREASE
YOUR PLAN PAYMENT TO COVER YOUR UTILITY BILLS**

TO THE DEBTORS AND ALL RESPONDENTS:

You, (the Debtors), have not paid your post petition utility bills as and when they became
due. The Peoples Natural Gas Company, LLC is entitled to seek to terminate your utility service
because of this failure to pay the bills.

The PEOPLES NATURAL GAS COMPANY, LLC understands that your utility service
is vital to your health and safety and to the success of your Chapter 13 Plan. In past hearings, the
majority of Debtors in this District have asked the Court to include their utility payments in their
Chapter 13 Plan to avoid the possibility of termination. Because this appears to be the solution
preferred by most Debtors, the PEOPLES NATURAL GAS COMPANY, LLC, instead of
seeking to terminate your utility service at this time, is asking the Bankruptcy Court in this
Motion to require the Debtors ("you") to pay your post petition delinquent utility bill and your
ongoing monthly utility budget as part of your Plan payment to the Chapter 13 Trustee. **If the
Court grants this Motion, your Plan payment will increase and, if you have a wage
attachment, your wage attachment will increase**. This increase will pay your post petition
utility bill, and you will no longer have to pay the PEOPLES NATURAL GAS COMPANY,
LLC directly. If you want this to happen, you do not need to do anything else.

If you do not want this to happen, then you or your attorney must file with the Clerk and
serve upon the undersigned attorney for the Movant S. James Wallace, a written response to the
attached Motion. This Response must be filed and served in accordance with the Federal Rules

of Bankruptcy Procedure, Local Rules and Procedures of this Court, and the procedures of the presiding Judge as found on the Judge's web page at www.pawb.uscourts.gov. Both the Clerk and the Attorney must receive your written response on or before February 13, 2017, (Seventeen (17) calendar days after the date of this Notice). If your written response is not received by this date, the Bankruptcy Court will grant this Motion without a hearing. See Local Bankruptcy Rule 9013.4.

If you do not file a Response but pay all the delinquent bills and any security deposit due on your post petition account before the date a Response is due, February 13, 2017, **and you advise the attorney in writing of your payment before the Court enters a default Order**, the PEOPLES NATURAL GAS COMPANY, LLC may be willing to withdraw this Motion without prejudice, if time allows. If you do file a Response but then pay all the delinquent bills and any security deposit due on your post petition account before the hearing date set by the Court, the PEOPLES NATURAL GAS COMPANY, LLC may be willing to withdraw this Motion without prejudice.

You should take this paper to your lawyer at once. He or she will explain exactly what is happening, what this means to you and what your options are.

If you file and serve your written response on time, a hearing will be held on March 8, 2017 at 11:00 A.M. before Judge The Honorable Jeffrey A. Deller in Court Room D, 54th Floor U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA. Only a limited time of 15 minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled at a later date by the Clerk. **Remember that no hearing will be held if you do not timely serve a written response.**

Date of service: January 25, 2017   Attorney for Movant

/s/S. James Wallace
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